



MARLBOROUGH TOWN COUNCIL

PRIVACY NOTICE

This privacy notice describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold and how you can contact us. The contents may change so you may wish to check this page occasionally. More specific privacy notices may be provided to you when you give us data for a specific purpose.

This version of our Privacy Statement is effective from June 2023.

The Information we collect

We collect information from you for the purposes of the provision of services, in the public interest, and where we have a legal requirement to do so. Such examples are:

1. The Town Council's executive work, for example, organising Council meetings, recording Council meetings for public viewing and transparency, publication of minutes and decisions and annual accounts, and Councillor's contact information.
2. Customer services such as making bookings at the Town Hall, Community & Youth Centre or other Council run facilities, such as our recreation ground, football pitches, open spaces, general enquiries, complaints, and compliments.
3. Engagement with local community organisations for the purposes of project work, volunteer work, grant applications and work experience opportunities.
4. Promoting the local economy by providing advice and support and working with local business to encourage development and regeneration through activities and events.
5. Neighbourhood planning and engaging with the community and stakeholders to play an active part of the development of the town.
6. Environmental services and the management of our open spaces, working with local groups and partners to achieve this. Communicating information to interested parties.

The Legal Basis for Processing Your Information

Depending on the reason that you provide information to us the legal basis may be one of the following:

1. When you enter into a contract with us for, employment purposes, use of an allotment or as a business provider we will rely upon article 6(1)(b) of the UK General Data Protection Regulations (UK GDPR).
2. Where processing is necessary for the purposes of the interests pursued by the Council, such as enquiries, civic events or planning consultations, article 6(1)(f), UK GDPR.
3. When you specifically consent to the use of your personal data such as communication with you promoting local businesses, events and, opportunities or as part of a specific event, we will always ask your consent and will make it clear to you what we will do with your personal data. Article 6(1)(a), UK GDPR.

4. We may be required to process information when the law requires us to do so such as health and safety requirements, audit functions or part of the employment process. Article 6(1)(c), UK GDPR.
5. We may process your personal data when you provide it to us or the provision of a task that we are required to perform such as managing allotments. Article 6(1)(e), UK GDPR.
6. In the unlikely event of personal injury, we may need to provide personal data about you in your vital interests. Article 6(1)(d), UK GDPR.

When we handle special categories of personal data we will be required to do so under an additional legal basis. Special categories of personal data include more sensitive information such as health, ethnicity, religious or political information. Below is a list of examples where we may use such information:

1. In the administration of staff, such as during the recruitment process or as a requirement to demonstrate equality in the workplace. This may include information related to criminal convictions. Article 9(2)(b) and schedule 1, part 1, Data Protection Act 2018.
2. Providing adequate access to any of the Council's services or facilities and ensuring the inclusion of all individuals. Article 9(2)(h), UK GDPR.
3. Where you provide explicit consent for us to do so. Article 9(2)(a), UK GDPR.

Sharing your Information

We will only share your information where we have a clear legal reason to do so, or you have provided consent and, in any case, you will be provided with more specific information in the form of a privacy notice at the time your data is collected. Examples of sharing include the following:

1. With third party companies that may require the data to fulfil a service request that you have made, such as part of a booking or event management.
2. With Wiltshire Council when the processing purpose requires their involvement or maybe required in order to recover unpaid tax.
3. With HMRC and the Department for Work and Pensions.
4. The Police for the prevention and detection of crime or, for the apprehension of offenders.

The Length of Time we Keep your Data for.

In most cases general communication or enquiries are held for 2 years, financial and employment information up to 7 years after the last transaction or longer where necessary. You will be informed, where necessary, in the specific privacy notice at the time of giving your information how long data will be kept for.

What are your rights

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. We will respond to you within 30 days after we have received any request (including any identification documents requested).

You have the right to:

1. Ask for a copy of the information that we hold about you.
2. Correct and update your information.
3. Withdraw your consent (where we rely on it).
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information.
5. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information.
6. Transfer your information in a structured data file (in a commonly used and machine-readable format), where we rely on your consent to use and process your personal information.

Contact information

You can exercise the above rights and/or manage your information by contacting us using the details below:

Identity of data controller: Town Clerk

Postal address: Marlborough Town Council, 5 High Street, Marlborough, SN8 1AA

Email: Townclerk@marlborough-tc.gov.uk

Phone: 01672 512487

Complaints

If you wish to raise a complaint on how we have handled your personal data, please contact us at townclerk@marlborough-tc.gov.uk

If you are not satisfied with our response you can complain to the Information Commissioner's Office (ICO). The ICO's contact details are below:

Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Email: casework@ico.org.uk

Phone: 0303 123 1113